## **EXHIBIT 4**

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## HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

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10 11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN FRANCISCO DIVISION			
14	WAYMO LLC	Case No. 3:17-cv-00939-JCS		
15	Plaintiff, vs.	PLAINTIFF WAYMO LLC'S THIRD SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS		
16	UBER TECHNOLOGIES, INC.;	Honorable William H. Alsup		
17	OTTOMOTTO, LLC; OTTO TRUCKING LLC,	HIGHLY CONFIDENTIAL –		
18 19	Defendants.	ATTORNEYS' EYES ONLY		
20				
21	PLAINTIFF'S THIRD SET OF	REQUESTS FOR PRODUCTION		
22	TO DEFENDANTS UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC; OTTO TRUCKING LLC,			
23				
24	Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Waymo LLC			
25	("Waymo") request that Defendants Uber Technologies, Inc. ("Uber"), Ottomotto, LLC			
26	("Ottomotto"), and Otto Trucking LLC ("Otto Trucking" (collectively "Defendants"), produce for			
27	inspection and copying within thirty days (30) h	hereof the documents set forth below at the offices		
28	01980-00104/9336283.1	1 Case No. 3:17-cv-00939-JCS OF REOUESTS FOR PRODUCTION TO DEFENDANTS		
- 1	PLAINTIFF WATMU 5 I HIKD SET	OF REQUESTS FOR PRODUCTION TO DEFENDANTS		

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## HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

1	REQUEST FOR PRODUCTION NO. 157:		
2	DOCUMENTS sufficient to show the reasons behind DEFENDANTS' and/or OTTO		
3	TRUCKING's decision not to deploy self-driving trucks in Texas.		
4	REQUEST FOR PRODUCTION NO. 158:		
5	DOCUMENTS sufficient to show DEFENDANTS' past, present, and future plans to test		
6	self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,		
7	Pennsylvania, Arizona, and California.		
8	REQUEST FOR PRODUCTION NO. 159:		
9	DOCUMENTS sufficient to show the total number of miles DEFENDANTS' self-driving		
10	trucks have traveled each month in each state, broken out by month and by state.		
11	REQUEST FOR PRODUCTION NO. 160:		
12	DOCUMENTS sufficient to show DEFENDANTS' past, present, and future plans to test		
13	self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,		
14	Pennsylvania, Arizona, and California.		
15	REQUEST FOR PRODUCTION NO. 161:		
16	All DOCUMENTS and COMMUNICATIONS REGARDING the naming of FUJI.		
17	REQUEST FOR PRODUCTION NO. 162:		
18	All DOCUMENTS and COMMUNICATIONS REGARDING the naming of SPIDER.		
19	REQUEST FOR PRODUCTION NO. 163:		
20	All DOCUMENTS and COMMUNICATIONS REGARDING the naming of OWL.		
21	REQUEST FOR PRODUCTION NO. 164:		
22	All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING		
23	LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.		
24	REQUEST FOR PRODUCTION NO. 165:		
25	All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING		
26	LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.		
27			
28	01980-00104/9336283.1		
	8 Case No. 3:17-cv-00939-JCS PLAINTIFF WAYMO'S THIRD SET OF REOUESTS FOR PRODUCTION TO DEFENDANTS		